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517 South Division Street
Spokane, WA 99202

June 3, 1999

Thomas Ferns
U. S. Dept. of Energy Richland Operations Office
P.O. Box 550, MSIN HO-12
Richland, WA 99352

RE: WRITTEN COMMENTS ON HANFORD EIS

Dear Mr Ferns,

Please accept these written comments from The Lands Council on the Draft Hanford Remedial Action Environmental Impact Statement (HRA EIS). As an organization that seeks to protect and restore the environment in the inland Northwest, The Lands Council believes the future management of the Hanford Reach is a critical part to restoring shrub-steppe habitat along the Columbia River. In addition, the salmon recovery efforts in the Columbia River Basin, in part must rely on protection of the Columbia River along this free flowing stretch.

The Lands Council supports the DOE Preferred Alternative, but with the following modifications:

A. ALL DOE MANAGED LANDS IN AND SURROUNDING HANFORD REACH SHOULD BE PROTECTED AS A NATIONAL WILDLIFE REFUGE

The following adjoined DOE lands should be managed as a permanent National Wildlife Refuge: the Arid Lands Ecology Reserve, the McGee Ranch, the Riverland area, all DOE land on the entire Wahluke Slope, the Hanford Reach, and the Columbia River islands. This will provide a much-needed large, continuous "crescent" of protected land surrounding central Hanford.

B. EXPEDITE PROTECTION

The areas mentioned above are prime fish and wildlife habitat, uncontaminated by Hanford operations, and should not wait for protection until the complex decisions involving clean-up in the central Hanford area are made. To expedite

a final decision on management of uncontaminated lands, DOE should issue a separate Record of Decision (ROD) for the areas mentioned above.

C. NO AGRICULTURE, GRAZING, MINING OR COMMERCIAL DEVELOPMENT

To ensure long-term protection for key native species and systems located across the Site (including central Hanford), there should be no agriculture, commercial mining, or livestock grazing permitted. High intensity recreation should also be limited to development of a museum at the B-Reactor. Developments such as destination resorts, golf courses and commercial facilities should be prohibited.

Restrict all mining operations to those essential to completing clean-up and remediation on the Hanford Reservation. Mining areas should be transferred to the National Wildlife Refuge complex as clean-up is completed and certified.

D. PROTECT ALL OTHER IMPORTANT LANDS AT HANFORD

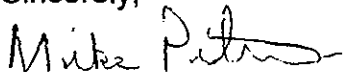
Because the Hanford Site is one of the last places in eastern Washington supporting large areas of native shrub-steppe vegetation and related wildlife, we strongly urge DOE to permanently protect the ecologically significant lands at Hanford--including those in central Hanford such as Gable Mountain, Gable Butte, Hanford Sand Dunes, Vernal Pools, and other important habitats.

E. RECREATIONAL USE SHOULD BE LIMITED TO NON-MOTORIZED, EDUCATIONAL TRAILS AND SITES

The Lands Council supports the idea of a trail, but the trail should be located to avoid sensitive wildlife habitat and native plant communities.

Thank you for the opportunity to respond to the draft EIS.

Sincerely,



Mike Petersen
Forest Watch Coordinator